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MEMO ENDORSED

cwaldman@stblaw.com

April 15, 2022

Re: *O'Brien v. Paysafe Ltd. et al.*, 1:22-cv-00567-ER-KHP**Via ECF**

Hon. Edgardo Ramos
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 619
New York, NY 10007

Hon. Katharine H. Parker
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl St.
New York, NY 10007

Dear Judge Ramos and Magistrate Judge Parker,

We represent the Plaintiff and Defendants (collectively the “Parties”) in the above-captioned case, and write jointly, pursuant to Rule 1.c of Magistrate Judge Parker’s Individual Practices in Civil Cases, to respectfully request an adjournment of the Initial Case Management Conference currently scheduled for May 5, 2022 and related deadlines set forth in Magistrate Judge Parker’s Initial Case Management Conference Order dated February 15, 2022 (ECF No. 14) (the “Order”).

The Court previously granted the Parties’ request that: (i) Defendants need not respond to the Complaint until after the Court has ruled on the pending motions to appoint lead plaintiff(s), and (ii) within fourteen (14) days after such appointment, Defendants and the appointed lead plaintiff(s) shall attempt to stipulate to and present to the Court for its approval a schedule by which Defendants shall respond to the Complaint or any amended complaint superseding the Complaint, as applicable. *See* ECF No. 24. As the Court has not yet ruled on the pending motions to appoint a lead plaintiff(s), and therefore there is no pending deadline to respond to the Complaint, the Parties respectfully request that the Court adjourn the Initial Case Management Conference and related deadlines set forth in the Order—including the deadlines for the Rule 26(f) and Rule 16(b) conferences, the exchange of initial disclosures, and the filing of a Report of Rule 26(f) Meeting and Proposed Case Management Plan—until such time as a lead plaintiff(s) is appointed and the Court has ruled on any forthcoming motion to dismiss.

This is the Parties’ first request for an adjournment of the Initial Case Management Conference.

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April 15, 2022

Respectfully submitted,

/s/ Nauman A. Amjad

Nauman A. Amjad

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**Counsel for Defendants William Foley,
Richard N. Massey and Bryan D. Coy**

Motion to adjourn conference denied. The two firms remaining who seek to be appointed lead counsel shall be prepared to discuss their respective motions at the conference. The Court will address other preliminary matters at the conference as well.

APPLICATION DENIED

Katharine H. Parker

KATHARINE H. PARKER
United States Magistrate Judge
04/18/2022